

EPA Response to Public Comments for EPA Public Docket OEI-2003-0026

On Tuesday, July 1, 2003, Federal Register (FR) notices were published that began the Information Collection Request (ICR) renewal process for the TRI Reporting Form R (68 FR 39074) and the Form A Certification Statement (68 FR 39071). The TRI Program is seeking OMB approval in compliance with the Paperwork Reduction Act (PRA) for these two collection activities that are due to expire on October 31, 2003. The EPA docket for this action, OEI-2003-0026 received 8 comment submissions. The commenters and their corresponding docket identifiers are listed in a table at the end of this comment response document. Docket identification numbers -0006 and -0008 are exact duplicates of comments submitted to the Form R ICR docket (OEI-2003-0025) and have been reviewed and responded to as part of the Form R Response to Public Comments document.

The comments submitted in response to EPA's request for renewal of the ICR for the Form A Certification Statement are outlined below. Comments submitted for the Form A Certification Statement ICR renewal having to do with Form A economic burden are included in the Response to Comments for Form R.

General Comments: The commenters suggested a number of changes to the TRI program that they believed would reduce the burden associated with reporting. Expansion of the eligibility to use the Form A was a common suggestion.

Some Specific Comments:

- Expand use and eligibility for using Form A Certification Statement
- Increase 500 lb. threshold to 5,000 lbs.
- Exempt "zero release" reporters
- Raise alternate threshold amount from 1 million to 10 million pounds
- Remove energy recovery and recycling from reportable amount calculation
- Institute "Enhanced Form A" for small releasers and PBT chemicals
- Restore Form A for lead and other PBT chemicals
- Institute a Form NS ("No substantial Revision Certification")
- Have the states accept online submission and certification to save time

Response: Most of the suggested changes were raised in the public comments submitted in response to the proposed Form R Information Collection Request renewal and have been responded to in that documents which will be included in the EPA docket under OEI-2003-0025. Most of the issues included in the list above will be addressed in an issue paper for an upcoming stakeholder dialogue on how to reduce TRI reporting burden. During the stakeholder process, EPA will solicit comments on these and any other suggestions that stakeholders may have for reducing the reporting burden of the TRI program. EPA welcomes commenters to raise these and any other Form A burden reduction measures during the stakeholder dialogue process.

Form A ICR Commenters

Commenter	OEI E-Docket Identification Number
John Parker	OEI-2003-0026-0003 (comment refers to the Form R ICR renewal and is reviewed as part of that Response to Comments document)
Anonymous	OEI-2003-0026-0005
Center for Regulatory Effectiveness	OEI-2003-0026-0006
International Dairy Foods Association	OEI-2003-0026-0008
Office of Advocacy of the U.S. Small Business Administration	OEI-2003-0026-0009
Consumer Specialty Products Association	OEI-2003-0026-0012
IPC - Association Connecting Electronics Industries	OEI-2003-0026-0013
Synthetic Organic Chemical Association (SOCMA)	OEI-2003-0026-0014